

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x Case No. 1:21-cv-11024-KPF-RWL

UNITED KING FILM DISTRIBUTION LTD, D.B.S.
SATELLITE SERVICES (1998) LTD, HOT
COMMUNICATION SYSTEMS LTD, CHARLTON
LTD, RESHET MEDIA LTD, AND KESHET
BROADCASTING LTD,

**: DECLARATION OF JUSTIN
: PAINE IN SUPPORT OF
: NON-PARTY CLOUDFLARE,
: INC.'S OPPOSITION TO
: PLAINTIFFS' MOTION FOR
: CONTEMPT**

Plaintiffs,

-- against --

DOES 1-10, d/b/a Israel.tv,

Defendants.

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X

DECLARATION OF JUSTIN PAINE

I, Justin Paine, declare as follows:

1. I am Cloudflare's Senior Director, Global Head of Trust & Safety. I submit this declaration in support of Cloudflare's Opposition to Plaintiffs' Motion for Contempt. I have personal knowledge of the facts set forth in this declaration, except where such facts are set forth upon information and belief, and as to such facts I believe them to be true.

2. I have reviewed Cloudflare’s records of correspondence concerning this litigation. Cloudflare received a subpoena from Plaintiffs concerning this litigation (the “Subpoena”). Cloudflare responded in writing to acknowledge the Subpoena on March 28, 2022, and produced records in response on April 6, 2022. Cloudflare also provided Plaintiffs with copies of information from its records in response to the Subpoena. Based on my review of Cloudflare’s records and correspondence, Plaintiffs did not request any additional information from Cloudflare in connection with this case after Cloudflare responded to the Subpoena.

3. I am familiar with the systems and databases that Cloudflare uses to store and

maintain information about current and past customers. I have reviewed Cloudflare's records concerning the online domain www.Israel.tv (the "Website"). Multiple publicly available DNS resources show that the Website has not resolved to a Cloudflare IP address or any of Cloudflare's nameservers (which are used for providing authoritative DNS services) since May 26, 2022. Because the Website was not resolving to a Cloudflare IP address or pointing to Cloudflare's nameservers, the Website's traffic would not be transmitted over Cloudflare's network and it could not effectively use Cloudflare's services.

4. I also reviewed Cloudflare's records concerning the following online domains (which I understand are referred to collectively in Cloudflare's Opposition as the "Add-On Domains"): israelv.hk; israelv.se; israelv.nu; israelv.la; and israelv.bz. None of the subscriber information associated with the Add-On Domains matches the subscriber information that was previously associated with the www.Israel.tv Website.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 15, 2022 at Berkeley, CA.

[signed] 
Justin Paine